



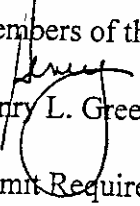
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August 26, 1998

TO: Members of the State Construction Code Commission
FROM:  Henry L. Green
SUBJECT: Permit Requirements for Re-roofing

After the last Commission meeting I was asked to develop a background paper on the requirements for issuance of permits for re-roofing. Some of you may recall, a survey was conducted in 1993 of local communities to determine the status of issuance of permits for this activity. An ad hoc committee was established after the survey to bring forward a recommendation to the Commission on this matter.

The results of this survey were included in a report filed with the Commission on October 7, 1993. (Copy attached) In that report, the findings noted that a total of 210 communities required permits for work involving the removal and replacement of structural roof decking. 21 communities required permits when the work exceeded 25% of the roof area within a 12 month period. 119 communities required permits for any roof replacements. Of the respondents requiring a permit for any roof replacement, 91 reported they did not require plans to be submitted. The number of inspection conducted varied greatly among the respondents. Some reported as many as four inspections on a re-roofing project, while others reported only one inspection at the completion of the work. No pattern of inspections resulted from the survey responses.

With respect to violations as a result of inspections, of the over 6600 permits reported in the survey, 720 violations were noted.

At the October 1993 Construction Code Commission meeting, a motion was adopted requiring a permit for roofing projects involving more than 25% of the roof area. No formal action has been taken to formalize this motion into a rule change. An ad hoc committee was formed by the Chair which never brought forth a report on their findings.

The code does provide that a permit is required to assure the safety of the public. This, I believe was the basis for the October 1993 Commission decision.

An earlier interpretation of the BOCA Codes states:

"Section 3402.6 requires that re-roofing be in compliance with the provisions of section 1512. If more than 25% percent of the roof covering is replaced within a 12-month period, the entire roof covering must be replaced to ensure that the fire-resistive integrity of the roof covering is

Memorandum to Members of the State Construction Code Commission

Page 2

August 26, 1998

maintained. Repairs less than 25% of a building's roof covering would be allowed every 12 months but must still be controlled through the permit application process to ensure the building's protection from the exterior weather elements."

The 1993 BOCA National Building Code Commentary notes:

Section 107.1.1 of the code "distinguishes between what might be termed by some as repairs but are in fact alterations, hence causing the code to be applicable, and ordinary repairs, which are maintenance activities that do not require a permit."

HLG/la

Attachment